

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO DAVID B. POPKIN MOTION TO COMPEL A RESPONSE TO INTERROGATORY DBP/USPS-19(a) (December 11, 1997)

On September 8, 1997, Mr. Popkin filed numerous interrogatories directed to the Postal Service, including DBP/USPS-19. The Postal Service provided a late response to that interrogatory on October 10, 1997. On November 20, 1997, Mr. Popkin moved to compel the Postal Service to provide "twenty numbers" that he indicates the Postal Service failed to provide in its response. *Popkin Motion at 1, para. 1.*

Mr. Popkin's discussion of the Postal Service's response to DBP/USPS-19(a) totally mischaracterizes it. In his motion, Mr. Popkin correctly indicates that interrogatory 19(a) requested total revenue and expenses for philatelic products for the past ten years, but then goes on to claim that the last sentence of the Postal Service's response "states that I should make a trip to Washington to examine the Comprehensive Statement on Postal Operations." *Id.* In actuality, the Postal Service's response to DBP/USPS-19(a) states in full:

Philatelic programs include the sale of stamps to collectors and the sale of other philatelic products. Postal Service accounting reports do not provide sufficient information to precisely determine the total revenues and expenses that result from philatelic programs. For example, revenue from sale of stamps is not separated in accounting records between the amount that is to be used for postage and the

amount that is to be saved by collectors. Also, printing and window service labor costs related to philatelic stamp sales are not available from Postal Service accounting records and reports. Estimates based on samples and the accounting information that is available are provided in the Comprehensive Statement on Postal Operations, copies of which are available in the Postal Rate Commission and the Postal Service library.

As is clear from the response, the information Mr. Popkin requested does not exist. Whatever limited information that is available that bears on the issue is contained in the Comprehensive Statement on Postal Operations.¹ In fact, the Comprehensive Statement does not contain the information for every year. The Postal Service's response fully and properly addressed Mr. Popkin's interrogatory. Since the Comprehensive Statement does not contain the precise information sought by Mr. Popkin, a motion to compel on this response is clearly not warranted; the proper procedure would have been for Mr. Popkin to file a follow-up interrogatory, specifically requesting whatever information is available from the Comprehensive Statement.²

Nonetheless, the Postal Service will prepare and shortly file Library Reference H-314 containing the relevant pages from those Comprehensive Statements for the past ten years that provide information relating to philatelic revenues and expenses. Mr. Popkin will be mailed a copy of the Library Reference.

¹ As indicated in the response, that information is based on sampling and is not comprehensive. An explanation of how that sampling is done was provided in subpart (b) of the Postal Service's response to DBP/USPS-19.

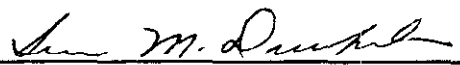
² In fact, Mr. Popkin did file a late follow-up interrogatory to DBP/USPS-19(c). See DBP/USPS-93, November 24, 1997.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

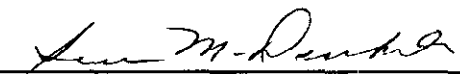
By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Susan M. Duchek

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